## REMARKS

Claims 1-13 and 15-22 are pending. Applicant has amended claims 1, 6, and 22 and cancelled claims 14 and 23-38.

The Examiner has rejected claims 1-13 and 15-22 under 35 U.S.C. § 103(a) as being unpatentable over Brooks in view Hartsog and Becker. Applicant has amended these claims to more clearly recite certain aspects of applicant's invention.

Brooks' technique and applicant's invention are fundamentally different. In particular, Brooks' technique assesses the adequacy of the security measures (e.g., cameras) currently in place at a facility, whereas applicant's invention analyzes whether a building itself satisfies security requirements. Because Brooks interchanges terminology and uses terminology inconsistently, it is difficult to understand what Brooks is describing. For example, Brooks states in one place that "a security value [is] representative of the appropriate intended or desired level of security" in ¶ 0009. In another place, Brooks states that a "security value can be calculated as a function of the security measures installed" in ¶ 0029. Thus, in one place Brooks states that a security value is the desired level of security, and in another place Brooks inconsistently states that a security value is the actual level of security. There are many other examples of such inconsistencies in Brooks. In the following, applicant provides a description of Brooks' technique at least as can be best understood by applicant.

Brooks describes a technique for determining an overall rating of the security of a facility based on the desired level of security and the current level of security. With reference to Figure 1, Brooks first identifies (110) the components of the facility, such as a passenger terminal area. Brooks then identifies (112) the attributes of the components. For example, the attributes of a passenger terminal area may be type of area (e.g., defined or undefined), number of access points (e.g., 16), and type of each access point (e.g., directional or unidirectional). Brooks assigns to each component one or more security

values that reflect the desired levels of security for the component based on the attributes of the component. For example, each component can have an access security value that indicates the desired level of security at access points as indicated by the type of access points of the component. Brook also assigns (114) to each component a security rating by, for example, adding up the rating values of each security measure of the component, which can be derived from industry standards. A security measure can be, for example, a camera installed in an area. Apparently, Brooks leaves out a step in Figure 1. In particular, Brooks apparently also calculates a rating score for each component that is a function of the security rating and security value for the component. [See, Brooks, ¶ 0010.] Brooks then calculates (116) the overall rating for the facility as a function of the security ratings [sic, rating scores] of the individual components.

In summary, Brooks assigns to each component of a facility a security value indicating the desired level of security for that component based on attributes of the component. Brooks then assigns a security rating to each component indicating the current level of security based on the current security measures. Brooks generates a rating score for each component based on its security value and security rating. Brooks finally generates an overall security rating for a facility based on the rating scores of the components of the facility.

Since Brooks' security rating for a component depends on the security measures that are currently in place, Brooks' technique depends on a person assessing the security measures that are currently in place. The person who performs this assessment must know what is a security measure. This knowledge can present problems. First, the person who provides this assessment must be trained to assess security measures. The training can be time-consuming, and the person providing the assessment may be highly paid. Second, knowledge of what security measures are in place is highly confidential, and the more widespread the knowledge the greater the likelihood that the knowledge will fall into the wrong hands.

Applicant's invention attempts to solve the problems of Brooks' technique by not requiring a person to assess <u>security measures</u> that are currently in place. Rather, applicant's technique simply requires collection of information describing <u>characteristics of a building</u> (e.g., window thickness and distance to facility perimeter). These characteristics are not security measures, but rather raw characteristics of a building that do not require knowledge of security measures or requirements. Applicant's technique provides "calculation rules" for indicating how to calculate values from these characteristics. For example, a calculation rule for window thickness may be to provide a calculation value of "adequate" if the window is single pane polycarbonate regardless of the thickness or if the window pane is single pane with a thickness greater than 7 mm regardless of its composition. Applicant's technique also provides "compliance rules" for determining whether a security requirement is in compliance based on the calculated values. For example, a compliance rule for window treatments may indicate compliance when the window thickness is adequate or the window is located at least a certain minimum distance from the facility perimeter.

Brooks' technique has nothing similar to applicant's calculation rules or compliance rules. Applicant has amended claim 1 to explicitly recite both calculation rules and compliance rules.

The Examiner relies on Hartsog as describing determining whether a facility is in compliance with, for example, building regulations. It is not clear how the Examiner is proposing to modify Brooks based on Hartsog. A straightforward approach might be to add rules to Brooks that could be used to evaluate whether security measures of a component meet the security value (desired level of security). With this modification, however, Brooks would still only provide an assessment of the adequacy of the current <u>security measures</u>, and not provide calculation rules based on the <u>characteristics of a building</u>.
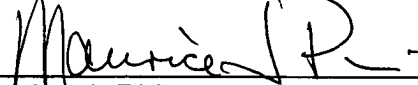
Based upon these remarks, applicant respectfully requests reconsideration of this application and its early allowance. If the Examiner has any questions or believes a telephone conference would expedite prosecution of this application, the Examiner is encouraged to call the undersigned at (206) 359-8548.

Dated:  December 29, 2005                Respectfully submitted,

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